

Case 1:12-cv-05230-JPO-MHD Document 77 Filed 02/03/15 Page 1 of 2

# Frankfurt Kurnit Klein + Selz, LLP

Edward H. Rosenthal

458 Madison Avenue, New York, New York 10022

T (212) 826 5524 F (347) 438 2114

erosenthal@fkks.com

**COPY**

February 3, 2015

**BY FACSIMILE (212-805-7928) and ECF**

Honorable Michael H. Dolinger  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 17D  
New York, New York 10007-1312

2/4/15

Re: Young-Wolff v. John Wiley & Sons, Inc., No. 12-cv-5230 (JPO) (MHD)  
Warren v. John Wiley & Sons, Inc., No. 12-cv-5070 (JPO) (MHD)

Dear Judge Dolinger:

We represent defendant John Wiley & Sons, Inc. ("Wiley") in the above-captioned matters. We are writing further to the requests by your Chambers prior to the settlement conferences held in December 2014 that the parties submit a proposed schedule for the filing of dispositive motions and/or pre-trial orders in these two cases. We have consulted with counsel for the Plaintiffs, and they join in this request.

The parties jointly propose that they inform each other by no later than February 13, 2015 whether they intend to file a motion for summary judgment in one or both cases and the issues on which they intend to seek summary disposition. Assuming that motions will be made in both cases, we further propose that any summary judgment motion be filed on or before March 13, 2015, with oppositions due April 14, 2015 and replies due by April 28, 2015. In the event that neither party files a motion in one or both of these cases, the parties propose that the pre-trial order would be due on April 28, 2015.

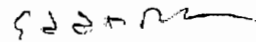
ENDORSED ORDER  
The proposed schedule is adopted.  
W. J. W. W.  
2/3/15

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Hon. Michael H. Dolinger  
February 3, 2015  
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Thank you for your consideration.

Respectfully submitted,



Edward H. Rosenthal

cc: Kevin McCulloch, Esq. (via email - kmcculloch@nelsonmcculloch.com)  
Daniel A. Nelson, Esq. (via email - dnelson@nelsonmcculloch.com)

## **FAX Cover Sheet**

**Date:** February 3, 2015

**To:**

Daniel A. Nelson, Esq.  
Kevin P. McCulloch, Esq.  
Nelson & McCulloch LLP  
Fax: (646) 308-1178

Beth I. Goldman, Esq.  
Edward H. Rosenthal, Esq.  
Frankfurt Kurnit Klein & Selz PC  
Fax: (212) 593-9175

Christopher P. Beall, Esq.  
Robert Penchina, Esq.  
Levin, Sullivan, Koch & Schulz, LLP  
Fax: (212) 850-6299

**Re:** Young-Wolff v. John Wiley & Sons, Inc.  
12 Civ. 5230 (JPO) (MHD)

Warren v. John Wiley & Sons, Inc.  
12 Civ. 5070 (JPO)(MHD)

**Endorsed Order:** *The proposed schedule is adopted.*

**From:** Magistrate Judge Michael H. Dolinger  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1670  
New York, New York 10007-1312

FAX (212) 805-7928

TELEPHONE (212) 805-0204

**This document contains 4 pages, including this cover sheet.**